Remarks

Applicant respectfully requests reconsideration of this application as amended. Claims 1, 6, 16, 19, 22, 24, and 29 have been amended. No claims have been cancelled or added. Claims 11-15 and 34-38 were previously canceled. Therefore, claims 1-10 and 16-33 are presented for examination.

35 U.S.C. §103(a) Rejection

Claims 1-2, 4-7, 9-10, 16-17, 19-20, 22, 24-25, 27-30, and 32-33 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Kinnunen et al. (U.S. Pub. No. 2001/0018349) in view of Jacobson et al. (U.S. Patent No. 6,426,959). Applicant submits that the present claims are patentable over Kinnunen in view of Jacobson.

Kinnunen discloses a system for providing location dependent services to a plurality of mobile terminals within a coverage area. The system defines services deployment areas in which the services are available. A server receives, from a plurality of sources, location information indicating the locations of mobile terminals and tracks them so that their presence in particular service deployment areas can be determined. The services receive meta-information classifying the location information and use this meta-information to determine whether the source of the location information is reliable enough for the service to be provided. If it is reliable enough, the service is provided to the mobile terminal. (Kinnunen at Abstract.)

Jacobson discloses a system for controlling a network of communication terminals with a management component and an implementation component. The implementation component is in communication with the management component to receive at least one

transmission plan, the transmission plan containing a scheduled implementation time. The implementation component receives the transmission plan and decodes the implementation time for the transmission plan and outputs the command to the network component at the implementation time to implement the transmission plan. (Jacobson at Abstract.)

First, applicant submits that Kinnunen is not a proper prior art reference under 35 U.S.C. §103, as it is nonanalogous art. The MPEP at §2141.01(a) provides that "[i]n order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was concerned." (citing *In re Oetiker*, 977 F.2d 1443, 1446 (Fed. Cir. 1992)) Kinnunen is only concerned with identifying the location of mobile terminals so as to match the terminals with the service providers within the coverage area. (*See* Kinnunen at pg. 1, Summary of the Invention.) This subject matter is fundamentally different from the field of applicant's endeavor in the present application, which includes discovering and configuring a new network device through API calls. Kinnunen is not at all concerned with network devices. Therefore, Kinnunen is nonanalogous art and, thereby, improperly applied under the present 35 U.S.C. §103 rejection.

Second, applicant submits that Kinnunen in view of Jacobson does not disclose or suggest each and every claim limitation of the present application. Claim 1, as amended, recites:

> A method of dynamically discovering and configuring a new network device comprising:
> registering the new network device with a lookup service, wherein the new network device includes software to automatically search for the lookup service within a specific network device domain and wherein the lookup service to connect a client looking for a service with the service;

detecting the new network device by examining the lookup service from an administration terminal;

notifying a human operator of the presence of the new network device through a graphical user interface on the administration terminal;

responsive to the human operator selecting an option available on the graphical user interface, issuing a series of one or more generic Application Program Interface (API) calls representative of the option to the new network device, wherein said API calls cause execution of interface software preloaded on the new network device, the interface software containing instructions specific to the new network device for implementing the API calls; and

executing the interface software to perform device specific tasks equivalent to the series of the one or more generic API calls.

Specifically, applicant submits that Kinnunen does not disclose or suggest registering the new network device with a lookup service, wherein the new network device includes software to automatically search for the lookup service within a specific network device domain and wherein the lookup service to connect a client looking for a service with the service, as recited by claim 1. The Office Action states that Kinnunen discloses this feature at Figure 4. (Office Action mailed 3/9/06 at pg. 2, point 5.) However, applicant can find no disclosure or suggestion of this feature anywhere in Figure 4. For instance, Figure 4 depicts an LDS client, an arbiter, and a SLP SA. There is no teaching in this figure of a new network device registering with a lookup service, where the new network device includes software to automatically search for the lookup service within a specific network device domain and wherein the lookup service to connect a client looking for a service with the service.

Although there is discussion in Kinnunen of a lookup service (see, e.g., Kinnunen at Fig. 2), there is no disclosure or suggestion of a network device that registers with this lookup service, where the network device includes software to automatically search for the lookup service within a specific network device domain. Therefore, Kinnunen does not disclose or suggest the cited feature of claim 1.

Applicant further submits that Jacobson does not disclose or suggest registering the new network device with a lookup service, wherein the new network device includes software to automatically search for the lookup service within a specific network device domain and wherein the lookup service to connect a client looking for a service with the service. The Office Action does not rely on Jacobson to teach this feature, nor can applicants find any disclosure or suggestion of this feature anywhere in Jacobson.

As neither Kinnunen nor Jacobson individually discloses registering the new network device with a lookup service, wherein the new network device includes software to automatically search for the lookup service within a specific network device domain and wherein the lookup service to connect a client looking for a service with the service, any combination of Kinnunen and Jacobson also does not disclose or suggest such a feature. Therefore, claim 1, as well as its dependent claims, is patentable over Kinnunen in view of Jacobson.

Independent claims 6, 16, 19, 22, 24, and 29 also recite, in part, registering the new network device with a lookup service, wherein the new network device includes software to automatically search for the lookup service within a specific network device domain and wherein the lookup service to connect a client looking for a service with the service. As discussed above, Kinnunen in view of Jacobson does not disclose or suggest such a feature. Therefore, claims 6, 16, 19, 22, 24, and 29 are patentable over Kinnunen in view of Jacobson for the reasons discussed above with respect to claim 1.

Claims 3, 8, 18, 21, 23, 26 and 31 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Kinnunen-Jacobson, as applied to claims 1, 6, 16, 22, 24, and 29 above, in

view of what was well known in the art. Applicant submits that the present claims are patentable over Kinnunen-Jacobson in view of what was well known in the art. Claims 3, 8, 18, 21, 23, 26, and 31 variously depend from independent claims 1, 6, 16, 19, 22, 24, and 29. As discussed above, claims 1, 6, 16, 19, 22, 24, and 29 are patentable over Kinnunen in view of Jacobson. What was well known in the art does not remedy the defects of Kinnunen and Jacobson in light of claims 1, 6, 16, 19, 22, 24, and 29. Therefore, claims 3, 8, 18, 21, 23, 26, and 31 are patentable over Kinnunen and Jacobson, in view of what was well known in the art.

Applicant respectfully submits that the rejections have been overcome and that the claims are in condition for allowance. Accordingly, applicant respectfully requests the rejections be withdrawn and the claims be allowed.

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Applicant respectfully petitions for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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